#### Message

From: Garwood, Gerri [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A874553C607E41259CC3C473EA299920-GARWOOD, GERRI]

**Sent**: 10/3/2018 10:02:10 PM

**To**: Toby Hanna [Toby.Hanna@erm.com]

Subject: RE: AFPM Env. Conference Fenceline Monitoring Session - Panel Planning Calls & Notes

Attachments: AFPM Panel 3.pptx; AFPM Panel 2.pptx

Hi Toby,

Apologies for the delay, but I finally received clearance.

Gerri

919-541-2406

From: Toby Hanna [mailto:Toby.Hanna@erm.com]

**Sent:** Monday, October 01, 2018 1:17 PM **To:** Garwood, Gerri < Garwood.Gerri@epa.gov>

Subject: RE: AFPM Env. Conference Fenceline Monitoring Session - Panel Planning Calls & Notes

Thanks very much for the update and for working to make it happen, Gerri

Toby Hanna, P.E Air Quality Leader

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From: Garwood, Gerri < Garwood.Gerri@epa.gov > Sent: Monday, October 01, 2018 12:18 PM
To: Toby Hanna < Toby.Hanna@erm.com >

Subject: RE: AFPM Env. Conference Fenceline Monitoring Session - Panel Planning Calls & Notes

Hi Toby,

I did screenshots for both the 2<sup>nd</sup> and 3<sup>rd</sup> panels, but they haven't cleared yet. It caused more than anticipated excitement using the OOOOa form example. But I'm talking to my director this afternoon and will hopefully get them cleared today.

Gerri

919-541-2406

From: Toby Hanna [mailto:Toby.Hanna@erm.com]

Sent: Monday, October 01, 2018 11:31 AM

To: Reese, J Derek < j.derek.reese@exxonmobil.com>; Andrew Woerner < Andrew.Woerner@erm.com>; Hedrick

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Cc: Navita Khokha < Navita.Khokha@erm.com >; Michael Burnside < MBurnside@afpm.org >

Subject: RE: AFPM Env. Conference Fenceline Monitoring Session - Panel Planning Calls & Notes

I haven't seen any slides yet from anyone. Sorry to be "that guy," but we're pretty late at this point. Can those with slides in the works send me an updated expectation?

Thank you.

Toby Hanna, P.E Air Quality Leader

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From: Toby Hanna

Sent: Tuesday, September 18, 2018 4:16 PM

To: 'Reese, J Derek' < j.derek.reese@exxonmobil.com >; Andrew Woerner (Andrew.Woerner@erm.com)

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Cc: Navita Khokha <<u>Navita.Khokha@erm.com</u>>; 'Michael Burnside' <<u>MBurnside@afpm.org</u>>

Subject: RE: AFPM Env. Conference Fenceline Monitoring Session - Panel Planning Calls & Notes

We finished our panel-specific calls on Friday. Thanks to everyone that made those calls so productive. We have a good plan for each panel. The final lineup, content and format is outlined in our call notes below. This summary is meant to be a comprehensive outline that we can refer to prepare for the panels. Please review and email back anything we missed or should consider doing differently.

We will have a handful of slides for each panel. Mike, we're hoping to get those to AFPM for review this week (next week at the latest).

I have included draft polling questions and answer choices for each panel in the notes for each panel below. **Please** help make these shine, suggestions welcome. Please provide feedback by September 28<sup>th</sup>.

Source Identification Panel (Panel #1)
Derek, Taryn, Morgan, Chris, Chad, Hedrick
Call 9/11/18

Emphasis is on source identification and resolution, highlighting common causes, and solutions/tricks to identify or resolve. Focus on a few storytellers with the rest of the panelists chiming in with questions/insights.

Potential polling questions (spread throughout, rather than concentrate them at the beginning):

What are your largest benzene contributors? (choose one or more: tanks/docks/offsite (neighbors) sources/turnarounds/other)

What methods are you using to find sources of high concentrations (choose one or more: FLIR/portable GC/back trajectory modeling/operating records/it's obvious)

### Flow (30 minutes):

- 1. Kickoff by Derek 1 polling question
- 2. Taryn, Morgan, and Derek will describe their process to identify a source. Ideally they'd be able to highlight specific examples including the approach and what the source turned out to be. Discuss how this has or has not become part of their standard procedures for RCA/source identification. Expecting 2 slides each for this.
- 3. Polling question(s). Other panelists can come up with seed questions that they can help answer. Chris has not had major issues but can offer other perspectives.
- 4. Facilitator/Audience Q&A

SSMP Panel#2 Greg, Gerri, Taryn, Derek, Joe Call 9/10/18

Highlight Greg and Gerri's stories

Potential polling questions (pick 2 of 3 or try to fit all 3?):

Are you considering a SSMP for sources that are onsite, offsite, or both? (choose one or more: onsite/offsite/both/not considering a SSMP).

What are the major sources for which you are considering a SSMP? (choose one or more: non MACT CC sources/barges/neighbors/"internal fencelines" without public access/other – can we expand this list?) How much do you think offsite or onsite exempt sources contribute to your Delta C readings? (choose one: 0-10%/10-25%/25-50%/>50%)

### Flow (30 minutes):

- 1. Kickoff by Greg
- 2. Polling questions
- 3. Greg (5-7 minutes/3-5 slides) Why do we need SSMPs/for what sources? Why did Marathon need one (tough decision or bright line?)? Tell the story. Key decisions Marathon faced in preparing and negotiating its approved SSMP. What was/wasn't acceptable to EPA. Tips from his experience.
- 4. Gerri (5-7 minutes) Gerri to include information such as the number that have been submitted/approved, what constitutes a complete and approvable plan, and what the expectations are regarding public availability of the plan. EPA just finished the CEDRI upload for flare management plans and FLM SSMPs will probably go there too. Screen shots or website demo would be good.
- 5. Other panelists add their unique SSMP stories: Taryn, Derek, Joe (2-3 minutes each)
- 6. Facilitator/Audience Q&A

## Seed questions/questions to expect:

If there are HON tanks intermixed with CC tanks, how do you separate out the contributions? What can you do to a tank to get the FLM reading below the action level if the tank is already in compliance? What are acceptable methods to determine the uniform background? Have 90 days been sufficient to get plans approved?

Reporting Panel #3
Andy, Gerri, Derek, Taryn, Chris
Call 9/14/18

Highlight Derek and Gerri's data upload example using .xls spreadsheet and FLM background wording in the workbook.

Potential polling questions:

Where are you in the process of stakeholder engagement related to public benzene data? (choose one or more: haven't started/talked to local officials/have a written communication plan & schedule/presented to CAP/all done)

### Schedule (45 minutes):

- 1. Kickoff by Andy
- 2. Open demo spreadsheet and talk about steps and what goes where using Derek's dataset as a demonstration. Dataset will include some unique situations like SSMP adjustments, sample contamination, etc. May not be able to upload it to Webfire, but can show the O&G Webfire page that is similar. Will have backup screenshots in case technology fails. (15-20 minutes)
- 3. Discuss second tab that will have an explanation/disclaimer type text. Hopefully this language will be available for folks to review in advance of the conference. (5-10 minutes)
- 4. Andy, Taryn, Chris ask questions and add insights (5 minutes).
- 5. Facilitator/Audience Q&A (10-15 minutes as time allows)
- 6. Optional discussion if audience Q&A is lite: Poll audience about stakeholder engagement or have panelists talk briefly about stakeholder engagement. Exclude this part if audience/panelists are having an engaging discussion about reporting. Play it by ear.

#### Other

Don't be afraid to identify challenges, even when there is no clear answer. A clock will be running for each panel (30 min, 30 min and 45 min) Please get slides in asap. The due date was Sept. 15<sup>th</sup>

Toby Hanna, P.E Air Quality & Climate Change Lead

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ERM The business of suscessions

From: Toby Hanna

Sent: Wednesday, September 05, 2018 11:00 AM

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Cc: Navita Khokha < Navita.Khokha@erm.com >; 'Michael Burnside' < MBurnside@afpm.org >

Subject: AFPM Env. Conference Fenceline Monitoring Session - Panel Planning Calls & Notes

I hope everyone had a good close to their summer.

Thanks to all that joined our August 22<sup>nd</sup> planning call.

I've attached an updated agenda and below is a summary of the call to help us stay aligned as we work up to October 16th. Thank you Hedrick, for the call summary.

Next up, we need to schedule a one hour call for each of the panels to establish content, flow, seed questions, polling questions, materials, etc. You're welcome to join all of the calls, but the primary intent is to get a complete group of panelists on the phone for each panel.

### Please let me know which of the following dates/times work for you.

Source Identification and Resolution - Derek, Chris, Taryn, Morgan, Hedrick

- Monday 9/10 10:00-12:00 EDT
- Tuesday 9/11 10:00-1:00 EDT
- Thursday 9/13 10:00-12:00 EDT

### What's Working with Site Specific Monitoring Plans (SSMP) - Greg, Gerri, Derek, Joe, Taryn

- Monday 9/10 3:00-5:00 EDT
- Tuesday 9/11 12:00-3:00 EDT
- Thursday 9/13 3:00-5:00 EDT

## What to Expect from EPA Data Reporting - Andy, Gerri, Derek, Taryn, Chris

- Monday 9/10 12:00-1:00 or 3:00-5:00 EDT
- Tuesday 9/11 12:00-3:00 EDT
- Thursday 9/13 9:00-12:00 EDT

**Chad and Jessica**, there is room for you on the  $2^{nd}$  or  $3^{rd}$  panels if that's a fit for you. Please get in touch and we can discuss what makes sense.

Below is a summary of the 8/22 call. Please add anything we missed.

Attendees: Taryn Wier, Andy Woerner, Toby Hanna, Chris Drechsel, Morgan Nelson, Gerri Garwood, Joe Ibanez, Navita Khokha, Derek Reese, Hedrick Strickland. (Toby & Greg caught up on the 23<sup>rd</sup>)

AFPM received 4 different abstracts on FLM. AFPM selected one but requested that it incorporate parts of two other abstracts. The session will be 1 hour 45 minutes, from 1:30 – 3:15 PM Tuesday, October 16<sup>th</sup>. It will be divided into 3 panels, each with a separate overarching topic, and will focus on the path moving forward, rather than fundamentals of the rule. The session will start with opening remarks to provide background, context, and perhaps a real example that makes a good story. Panelist for each topic will briefly (no more than a few minutes each) highlight some interesting case studies, then the facilitator will ask some prepared questions for the panelist, and finally the audience will have a chance to ask questions directly or via text message that the facilitator will read. Menti polling will be available to foster audience interaction if it makes sense.

#### Source Identification and Resolution – 30 minutes

#### Derek, Chris, Taryn, Morgan, Hedrick

Panelists can share brief stories that could potentially include:

Taryn: Has some HON sources that are exempt from FLM. They're using a GC to monitor those sources and are working on a SSMP to exclude them. They also had some high readings around their barge loading/unloading docks and they used a FLIR camera to identify the source.

Joe: Marine loading

Chris: Hasn't had problems that require a root cause analysis but he can share general ideas on the topic. His refineries also identified potential problems prior to compliance sampling that led them to take proactive measures to avoid high readings. He could share some of these tips.

Hedrick: Marine loading problems identified via records review, refinery using intensive passive monitoring to identify sources, or another RCA starting this week and currently unresolved. Morgan: Using solar powered portable GC synced to an anemometer and automated to a map for troubleshooting. Have developed best management practices for turnarounds using these findings. Also identified that practices on docks after loading is complete were contributing to high readings. Derek also has stories if others are needed.

If panelists can share ballpark readings, the audience would probably appreciate it.

# What's Working with Site Specific Monitoring Plans (SSMP) – 30 minutes

Greg, Gerri, Derek, Taryn, Joe

Brenda is unable to make the conference but Gerri will join this panel in her place.

Greg will open with a discussion of his SSMP – the only one that is currently approved. Discussion to include why they needed the plan, how they're making adjustments to benzene readings, and the process to get it approved (what did EPA accept and what did they reject?).

Gerri will give an overview of the current state of SSMPs (how many have been approved, what have been approved, what has been denied, etc.).

Taryn can speak to pros/cons of a SSMP but they don't want to share details as the plans are still in the works. Can discuss key decision points, even if they don't share the outcome.

Derek will do likewise from ExxonMobil's perspective.

## What to Expect from EPA Data Reporting – 45 minutes

Andy, Gerri, Derek, Taryn, Chris

Will go over what is eminent with reporting.

Derek is providing a dummy dataset and panel will show what the upload format will look like, how to upload the data, and what the public will see. Panelists and even the audience can also discuss problems they've had or provide comments to the upload documents or process. Gerri requests that comments not be held until the conference. There is still time to incorporate comments as EPA is working to finalize its format. If that's complete before October 16th it won't be as easy to incorporate comments received at the conference. EPA has already tweaked the upload sheet based on comments provided during the formal comment period. document/process won't be finalized until the rule itself is finalized because the upload will reflect some of the rule updates. Consider a polling question asking what stage people are at in the stakeholder engagement process. Would be interesting to find out how many refineries are considering developing their own reporting website. Stakeholder engagement could be a panel in itself but the audience will appreciate some discussion of it.

Toby Hanna, P.E Air Quality & Climate Change Lead

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ERM The business of automobility

From: Toby Hanna

Sent: Thursday, August 02, 2018 11:19 AM

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Cc: Navita Khokha <<u>Navita.Khokha@erm.com</u>>; 'Michael Burnside' <<u>MBurnside@afpm.org</u>>
Subject: AFPM Env. Conference Fenceline Monitoring Session - First planning call

Hello all.

I think all of you have heard that you were approved by the AFPM Environmental Conference Screening Committee to participate in the "Navigating the First Year of Fenceline Monitoring" session at the conference.

This will be a series of panels running for an hour and 45 minutes to close out the conference on the afternoon of October 16<sup>th</sup> in San Antonio.

I've attached a working draft of the agenda with a first cut at seeding the panels. This is open for discussion and input from all of you. Help us make it even better.

I'd like to schedule a call to get your feedback and to align on the content and panelists for each session. Can you email back with your availability for a one hour call in the following timeslots?

- 9:30-3:00 EDT Tuesday 8/7
- 9:30-3:00 EDT Wednesday 8/8
- 9:30-1:30 & 3:30-5:00 EDT Thursday 8/9
- 10:00-2:00 EDT Friday 8/10

After this first call, we'll schedule one or two calls for each panel in September to tighten up each topic.

I'm happy to jump on the phone with any of you in the meantime.

This is going to be a great session. I'm so glad we can include all of your perspectives and knowledge. I know the audience and the panelists will all take home a ton of great information. Thank you for joining us.

Toby Hanna, P.E Air Quality & Climate Change Lead

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